

**Declaration of Paula Dearolf in Support of Notice of Removal of Team Health, Holdings**

Paula Dearolf, being first duly sworn, hereby deposes and says:

1. I, Paula Dearolf, am Executive Vice President, Revenue Cycle Operations, for the

family of affiliated companies operating under the brand name TeamHealth. I am an employee of

HCFS Health Care Financial Services, LLC. I have served in this position since 1994. As such, I

have personal knowledge of the matters set out below.

2. I have reviewed the complaint filed by Atlanta Heart Associates in the Henry County Superior Court. I understand that Atlanta Heart Associates seeks to recover certain collections received by InPhyNet Contracting Services, LLC, a TeamHealth-affiliated practice

group staffing the emergency department at Piedmont Henry Hospital, Inc. since 2019. Complaint ¶¶ 13, 18, 26, 34.

3. I have directed my staff to run a report from the accounting system to determine

the total amount collected for EKG billings from the Piedmont Henry Hospital Emergency

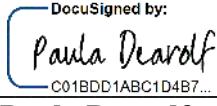
Department since January 1, 2019. That report indicates that the amount billed and received for

EKGs since January 1, 2019, exceeds \$175,000. This amount is for EKGs read for emergency

department patients by emergency medicine specialists providing care to those patients.

4. Thus, based on the books and records regularly maintained on behalf of InPhyNet Contracting Service, LCC, the amount in controversy in this action is in excess of \$75,000.

**I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct. Executed on September \_\_\_\_\_, 2021.**

9/15/2021 | 8:06 PM EDT  
DocuSigned by:  
  
Paula Dearolf  
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Paula Dearolf